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JAN - 5 2015

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF ILLINOISD. W. HUNTER, an Individual, an
Individual ("AUNT JEMIMA")
PLAINTIFFS'

vs.

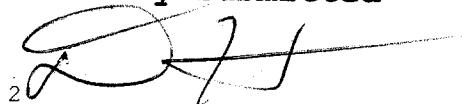
PEPSICO Inc., a Corporations, JANET
LYNN SILVERBERG, an Individual,
THE QUAKER OATS COMPANY, a
Corporation, PINNACLE FOODS
GROUP, LLC, Corporation, and DOES
1 through 25, inclusive,
DEFENDANTS.**Judge: Edmond E. Chang**
Case NO. 14CV6011**MEMORANDUM OF LAW IN**
SUPPORT OF OBJECTION TO
DOCKET 70 AND DEFENDANT
PINNACLE FOODS REPLY OF ITS
MOTION TO DISMISS**MEMORANDUM OF LAW****(Licensee Company Intermittent Windshield Wiper Systems)**

Kearns v. Ford Motor Co., 203, U.S.P.Q. 884, 888 (E.D. Mich. 1978), **Kearns v. Chrysler Corp.**, 32 F.3d 1541 (Fed. Cir. 1994), **Kearns v. General Motors Corp.**, 152 F.3d 945 (Fed. Cir. 1998) (unpublished decision); **Kearns v. Fred Lavery Porsche** 82-70749, **Wood Notors, Inc.**, **Volkswagen Werke A.G. Wolfsburg**, and, **Audi NSU Auto Union, A.G.**, **Kearns v. Ferrari S.p.A.** 85-70459, **AB-Volvo**, **Alfa Romeo S.p.A.**, **Automobiles-Citroen, S.A.**, **Bayerische Motoren Werks, A.G.**, **B-L PLC (British Leland)**, **Fuji Heavy Industries, Ltd.**, **Group Lotus Cars Co.**, **Honda Motor Co.**, **Isuzu Motor Co., Ltd.**, **Mitsubishi Motors Corp.**, **Nissan Motor Co., Ltd.**, **Officiene Alfieri Maserati**, **Peugeot, S.A.**, **Regie Nationale Renault**, **Rolls Royce Motors, Ltd.**, **Saab-Scania AB**, **Toyo Kogyo Co., Ltd (Mazda)**, **Toyota Motor Co., Ltd**, **Dealers in the Detroit area**, **Barnett Pontiac-Datsun, Inc.**, **Bavarian Motor Village, Ltd**, **Dagliesh Cadillac-Peugeot**, **Joe Dwyer Subaru Volvo, Inc.**, **Falvey of Troy**, **Grosse Pointe AMC-Jeep Renault**, **La Fontaine Toyota**, **Seaway Motors, Inc.**, **Sports Car Exchange, Inc.**, **Tamaroff Buick-DMC-Honda-Rolls Royce**, and, **Wood Motors, Inc.**; **Kearns v. General Motors Corp.** 85-70461; **Kearns v. United Technologies Corp.** 92-71408; **United Technologies Automotive, Inc.**; **Kearns v. General Motors Corp.** and, **Brown's Buick & Isuzu**, U.S. District Court Eastern District of

1 Virginia (Alexandria) 93-966-A, Kearns v. United States U.S. Claims Court 436-84C , Kearns v.
 2 United States U.S. Court of Appeals for the Federal Circuit 85-645 , Litigants(con't.) Court No.,
 3 Kearns v. United States Supreme Court of the U.S.84-1849, Kearns v. Fred Lavery Porsche Audi Co.,
 4 Wood Motors, Inc.,Volkswagenwerk A.G., and, Audi NSU Auto Union, A.G., U.S. Court of Appeals
 5 for the Federal Circuit 84-655, Kearns v. Fred Lavery Porsche Audi Co., Wood Motors, Inc.
 6 Volkswagenwerk A.G. and, Audi NSU Auto Union, A.G., Supreme Court of the U.S.84-907, Kearns v.
 7 Ford Motor Company, Wood Motors, Inc., Robert Bosch Corp., Daimler-Benz Aktiengesellschaft,
 8 Porsche, A.G., SWF-Specialfabrik fur, Kearns v. Chrysler Corp., American Motors Corp., .S. Court of
 9 Appeals for the Federal Circuit 92-1531, Kearns v. General Motors Corp., U.S. Court of Appeals for
 10 the Federal Circuit 93-1535, Kearns v. General Motors Corp. and, Brown's Buick & Isuzu, U.S. Court
 11 of Appeals for the Federal Circuit 94-1057, Kearns and Maureen Kearns v. Wood Motors, Inc., Robert
 12 Bosch Corp., Daimler-Benz Aktiengesellschaft, and Porsche, A.G., U.S. Court of Appeals for the
 13 Federal Circuit Litigants(con't.), Kearns v. Chrysler 94-1299, Chrysler Corp. and American Motors
 14 Corp., U.S. Court of Appeals for the Federal Circuit 94-1303, Kearns v. Toyota, Toyota Motor Co.,
 15 Ltd., Nissan Motor Co., Ltd., Toyo Kogyo Co., Ltd. (Mazda), and Fuji Heavy Industries, Ltd. (Subaru),
 16 U.S. Court of Appeals for the Federal Circuit 94-1305, Kearns v. Ferrari, S.p.A., Ferrari, S.p.A.,
 17 Toyota, Nissan, Honda, Toyo Kogyo (Mazda), and, Fuji (Subaru), U.S. Court of Appeals for the
 18 Federal Circuit 94-1306, Kearns v. Wood Motors, Wood Motors, Inc., Daimler-Benz
 19 Aktinegesellschaft, Dr. Ing. h.c.f. Porsche, A.G., U.S. Court of Appeals for the Federal Circuit 94-1307,
 20 Kearns v. Fred Lavery Porsche; Fred Lavery Porsche, Wood Motors, Inc.; Volkswagen Werke A.G.,
 21 and, Audi NSU Auto Union, A.G.; U.S. Court of Appeals for the Federal Circuit 94-1308; Kearns v.
 22 United Technologies; United Technologies Corp. and United Technologies Automotive, Inc.; U.S.
 23 Court of Appeals for the Federal Circuit; Kearns v. Bittman 94-1310; Bittman, Reed Smith Shaw &
 24 McClay; U.S. Court of Appeals for the Federal Circuit 94-1311; Kearns v. Amer. Arbitration Assoc.;
 25 Kearns v. Toyota, Toyota Motor Co., Ltd., Toyo Kogyo Co. (Mazda), Honda Motor Co., Ltd., Saab-
 26 Scania AB, Peugeot S.A., Nissan Motor Co., Ltd., Isuzu Motor Co., Ltd., Fuji Heavy Industries Ltd.
 27 (Subaru), Volvo, BMW, Renault, Ferrari, S.p.A., Alfa Romeo, S.p.A., et al.] U.S. Court of Appeals for
 28 the Federal Circuit 94-1321.

DATED: November 4, 2014

Respectfully Submitted



1 DATED: November 4, 2014

Respectfully Submitted

2 CERTIFICATE OF SERVICE

3 FOR THE COUNTY OF]
4 RAMSEY IN THE]ss.
5 STATE OF MINNESOTA]

Case No.: 14-CV-6011

6 I, _____, HEREBY certify that I am over the age of 18 years old, and
7 located at 1275 Lincoln Ave., Ste #1, St. Paul, MN 55105. I certify that I have placed
8 a prepaid postage, true and complete original to the court and copies to the
9 party(is) of record at the U.S. Postal Office located at Post Office on the date of Nov.
10 17, 2014, for this action of the following:

Objection + Memorandum

11 Mr. Dean N. Panos
12 Jenner & Block LLP
13 PepsiCo,
14 The Quaker Oats Company
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19 Almee E. Graham
20 John I. Grossbart
21 The Hillshire Brands Company,
22 Associate
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24 233 South Wacker Drive
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27 c/o Clerk
28 United States District Court
Northern District of Illinois
Everett McKinley Dirksen
United States Courthouse
219 South Dearborn Street
Chicago, IL 60604

I declare under the penalty of perjury under the laws of the State of Minnesota
and/or N. Carolina that the above is true and correct.

Date: 12/04/14

Respectfully Submitted,

